



P.O. Box 128 • 3824 S.W. 93rd St. • Hope, Minnesota 56046 USA  
Tel: 800-297-5997 or 507-451-6030 • Fax: 507-451-8201

August 15, 2005

Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMO-NOP  
1400 Independence Ave., SW. Room 4008  
So., Ag Stop 0268  
Washington, DC 20250

Email: [National.List@usda.gov](mailto:National.List@usda.gov)

Fax: (202) 205-7808

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Sunrich LLC supports the continued allowance of the following substance(s):

Name of Substance	Location on National List (ie. 205.605(a))	Reason for continued allowance.
Acids (Alginc, Citric and Lactic)	205.604 (a)	They are used for pH adjustment in organic processing.
Bentonite	205.604(a)	Bleaching clay for refining of organic oils
Calcium Carbonate	205.604 (a)	Fortifier for organic grain based beverages
Calcium Chloride	205.604 (a)	Coagulating aid in organic cheese making.
Cargeenan	205.604 (a)	Stabilizer used in grain based beverages.
Colors, nonsynthetic sources only	205.604 (a)	Annatto coloring for organic cheese.
Dairy Cultures	205.604 (a)	Used in making organic dairy powder products.

Enzymes	205.604 (a)	Used in sweetener production of organic sweeteners.
Flavors	205.604 (a)	Not all organic flavors are suitable for desirable products.
Nitrogen	205.604 (a)	Used as a stability blanket for organic oils.
Ascorbic Acid	205.604(b)	Used for fortification of products and a natural antioxidant.
Calcium Phosphates	205.604(b)	Calcium fortification and a free flow agent on organic spray dried powders.
Carbon Dioxide	205.604(b)	For use as an insect control means and expelling of organic oils.
Chlorine Materials	205.604(b)	For use as a cleaning agent.
Ferrous Sulfate	205.604(b)	For fortification of grain based beverages.
Glycerides	205.604(b)	For use in drum drying organic powders.
Hydrogen Peroxide	205.604(b)	For use as a microbiological control agent and a natural bleaching agent.
Lecithin	205.604(b)	For use as release agent in organic roll dried powders.
Nutrient vitamins and minerals	205.604(b)	For fortification of organic grain based beverages.
Pectin (low-methoxy)	205.604(b)	For stabilization of soy/juice beverages.
Phosphoric Acid	205.604(b)	For cleaning of organic processing equipment.
Silicon dioxide	205.604(b)	For use in refining

		organic oils.
Sodium Hydroxide	205.604(b)	For use in pH adjusting for organic processing.
Sodium Phosphates	205.604(b)	For use in organic cheese production.
Tocopherols	205.604(b)	For use as an antioxidant in organic products.
Xanthan Gum	205.604(b)	For use as a stabilizer and tack agent in organic products.
Gums- water extracted only (arabic, guar, locust bean, carob bean)	205.604(b)	For use as a stabilizer in organic products.
Lecithin – unbleached	205.604(b)	For use as a releasing agent in organic roll dried powders.
Pectin (high methoxy)	205.604(b)	For use in stabilization of soy/juice blends.

Sincerely,

Heather Ganske, Technical Services  
Sunrich LLC.  
3824 SW 93<sup>rd</sup> St  
Hope, MN 56046

Cc: Organic Trade Association  
National Organic Standards Board